

Charles Jeffrey Wilson
Attorney at Law

[REDACTED]

[REDACTED]

[REDACTED]

May 15, 2022

Jered T. Ede, Esq. Chief Legal Officer

[REDACTED]

RE: Request to Disclose documents regarding allegation against Wayne Woo

Dear Mr. Ede,

I am in receipt of your letter requesting certain documents regarding allegations that have been made against Placer County Undersheriff Wayne Woo. I am aware that the allegations against Woo have again become relevant as he is seeking to replace Devon Bell as Sheriff. I have read documents where Woo and his attorney have claimed these allegations of sexual misconduct with a minor have been investigated and determined to be completely unfounded and baseless. I have also seen a document where Woo's attorney threatened legal action against anyone who makes or has made these allegations.

While I have disclosed the fact that I have documents and information that refute that claim, I have refused to disclose these documents including Ms. Dubey. I suggested to Ms. Dubey that these documents could be obtained through a Public Records Act (PRA) request. I knew that the county was in possession of all of these documents and they were not the type of documents that would be legitimately destroyed. I also knew that these document were in the possession of the District Attorney's Office at the time of my retirement.

Ms. Dubey advised me that she had made the request and that Placer County claimed they had no records responsive to her PRA request. Given that response by the county, I told her I would disclose the documents but only in connection with a valid legal process. This would include the filing of a Writ of Mandamus to force disclosure under the PRA or to any party and/or their attorney who was sued for defamation by Woo.

Given the representations in your letter that you are considering filing the above mentioned Writ of Mandamus on her behalf, I will disclose the documents to you and provide a written declaration that will provide context for the documents. The declaration will also provide you with my knowledge of the circumstances surrounding the documents and the allegations against Woo. I had contemplated requiring you to issue me a subpoena for the documents. It is clear, however, that these documents will


be necessary for you to have prior to filing any case, and I would simply be putting off their inevitable disclosure.

Enclosed you will find the above referenced declaration and the five documents that are in my possession that you have requested. Keep in mind these are only the documents that I have in my possession. It should not be assumed that these are all the documents related to the allegations. Please also keep in mind that I currently have no intention at this point of disclosing these documents to any other person unless the documents are relevant in another legal process.

If you have any further questions or need any further clarification please feel free to contact me at my email address or phone number listed above.

Sincerely

Charles Jeffrey Wilson


CC: Lynette Dubey

DECLARATION REGARDING ALLEGATIONS AGAINST WAYNE WOO

The follow statement is in regard to the allegations of inappropriate sexual conduct with a minor that have been made against Wayne Woo and my knowledge of the investigation of those allegations. I have personal knowledge of the facts set forth below and, if called upon as a witness, I could and would competently testify thereto.

1. I was employed by the Placer County District Attorney's Office as a prosecutor for almost 23 years. During the last ten years I served as the Chief Assistant District Attorney and was responsible for the day- to-day operations of the office until my retirement. In this role, I reported directly to District Attorney Scott Owens. This role also included serving as the Public Information Officer.

2. In 2010, I prosecuted the case of the People v. David Allen Virgo. Virgo was charged with the attempted murder of several Deputy Sheriffs in 2006. He was convicted and was sentenced to a life term. Wayne Woo was a listed victim and was a critical witness in the case.

3. *Brady* evidence is that evidence which points to the innocence of the defendant. *Brady* evidence must be turned over to the defense in a timely manner. (See *Brady v. Maryland*, 373 U.S. 83 (1963). This includes evidence that undermines the credibility of a witness. (See *Giglio v. United States*, 405 U.S. 150 (1972). The *Brady* obligation is ongoing and applies to new information discovered on old cases. The *Brady* obligation also does not allow a prosecutor to purposely ignore evidence, and places a duty on a prosecutor to pursue such information when he or she is made aware that it may exist. *California Penal Code section 141* makes it a felony to intentionally fail to disclose *Brady* evidence. Failure to disclose could also result in disciplinary action by the State Bar to include disbarment.

4. All the documents referenced below and attached were in the possession of the District Attorney's Office at the time of my retirement. I retained a personal copy of these documents as evidence that I had complied with my ethical requirements under *Brady*.

5. On July 18th 2018, I received an email from a reporter asking if the District Attorney's Office was or had conducted an investigation of Wayne Woo within the last two years regarding allegation of sexual contact with minors. (Attached "A") I called then county counsel Gerry Cardin and advised him of the situation. We had a brief discussion on the matter where he was dismissive of the allegation. He was clearly agitated by the request from the reporter.

6. I advised Scott Owens of the call. Owens said he had heard rumors that there were accusations made by a Sheriff's Deputy named Ryan Berry. Berry and Woo had been very close friends early in their careers. Berry recently made allegations that Woo had a relationship with an underage woman and that he had actually got her pregnant and Woo arranged for her to have an abortion.

7. I have not spoken with Berry in many years. I only know him from earlier in my career when he was a witness in a few cases assigned to me for prosecution. I have never discussed the facts of the allegations against Woo with Berry.

8. I was then contacted soon thereafter by Sheriff Devon Bell. Initially Bell explained that after he was made aware of the allegation, County Counsel conducted an investigation. He implied the investigation was recently completed. He said these allegations were in fact made by a Deputy. He told me that Woo admitted having a sexual relationship with the alleged victim. He said they were able to determine the alleged victim was 18 and not underage. He did not give me the year of the alleged occurrence, but said it was some time back when Woo was a Sergeant and after Woo had divorced, or was divorcing, his previous wife implying that is was in the early 2000's. He claimed that they determined the victim was 18 years-old based on a document they found related to when the alleged victim was a ride along with the Sheriff's Department. I found this curious in that law enforcement has many data bases where they can obtain personal information such as dates of birth that could have confirmed her age. It was also curious that he would never provide exact dates for the alleged occurrence or the date of birth of the

alleged victim. These facts were the two most relevant dates related to the accusation once Woo admitted that he had in fact had a sexual relationship with the alleged victim.

9. He stated the alleged victim was located in another state and did not wish to cooperate with the investigation and denied the relationship with Woo. If Bell's statement was accurate, it was clear that she had lied given Woo's admission to a sexual relationship.

10. As Bell continued discussing the allegation, he changed his representations as to who had conducted the investigation. He stated now that his office had done the investigation with the oversight of County Counsel contrary to his earlier statement. Bell did not disclose any further information except that this has caused problems in Woo's marriage and that Woo was regretful about the sexual relations he had had with the alleged victim.

11. I explained my *Brady* obligations in the Virgo case to Bell. I explained that Woo gave critical testimony in the Virgo case and these allegations appear to have occurred close in time to the arrest of Virgo. I told him I would need to at least to read the report of the investigation before I could determine whether I would have to disclose the information to Virgo's attorney.

12. On July 23, 2018, I sent a response to the reporter that I had no records responsive to her request. (Attached "B") Also On July 23rd 2018, I sent a memo to County Counsel making a request for the report pursuant to my *Brady* obligation. (Attached "C")

13. On July 24 2018, I received a letter from Brett Holt, Placer County Counsel, stating that, in his opinion, the report was not discoverable under *Brady* and that Sheriff Bell was not going to turn the report over to me or let examine the report. (Attached "D")

14. Soon thereafter, I met in-person with Holt and explained to him that, as a lifelong prosecutor, I was well aware of my obligations under *Brady*. I told him that if I read the report and agreed that it was

properly investigated and unfounded, I would not send the letter to Virgo's defense counsel. If they did not let me see the report, I would have no choice but to send the Brady notification letter to Virgo's attorney. He refused to show me the report claiming that it might waive the confidentiality of the report. This of course is a different reason than given in his letter of the July 24, 2018. On August 1st 2018, I mailed the *Brady* notification to Virgo's attorney. (Attached "E")

15. Sheriff Bell then called then District Attorney Owens to complain regarding me sending the *Brady* letter. Owens came to my office and asked me if I had sent the letter. I confirmed that I had. It was apparent the Bell had contacted Owens in an attempt to stop me from sending the letter. It should be noted that I cannot be ordered not to comply with my *Brady* obligation. I also met briefly with Bell to show him the letter that I sent to Virgo's defense attorney. He stated that I have done a lot of damage to our relationship and that Woo was upset with me for sending the letter.

16. This ended my involvement in the case. No further action was taken by the District Attorney's Office. No further investigation was done or ever requested. I made the decisions to send the *Brady* letter because I felt there were several items that undermined my faith in the integrity of the investigation and my faith that the finding that the allegation was unfounded was credible. These items are outlined below.

17. Sheriff Bell's changing of who conducted the investigation into the allegation was troubling. It went from "County Counsel" to the "Sheriff's Office with the oversight of County Counsel." Holt then stated in his letter of the 24th that the Sheriff's Office investigated the allegation with oversight of County Counsel and later in the same letter states the Sheriff's Office investigated the case. Between the two men there were three versions of who investigated the allegations.

18. It was unclear why the Sheriff's Office would investigate the claim of criminal conduct and not request that it be conducted by an outside agency. I have never heard of an investigation of a high

ranking law enforcement officer being conducted by a direct subordinate. This is because there is a conflict of interest by the investigator. The subordinate officer is investigating a person that performs employment evaluations and makes decisions on promotional opportunities. If the investigator finds that the allegation was true, the assigned investigator could face repercussions in the future or at least fear those repercussions.

19. I was also aware that the Sheriff's Office had recently established a professional standards unit. These are referred to in some agencies as an Internal Affairs Unit. This allegation was not assigned to that unit it was assigned to a subordinate of Woo.

20. In the past, when allegations that are criminal in nature are made against an employee of the Sheriff's Office, they were referred to an outside agency to conduct the investigation. The District Attorney's Office was never asked to assist in this investigation nor was a case referred to our office for review. In this case, the District Attorney's office also had a conflict in that Woo's wife, Christina, was employed at the District Attorney's office as an investigator. The case should have gone to the Attorney General's Office or other police agency for an objective and unbiased review and investigation.

21. It appears that the determination that the allegation is unfounded was made by Sheriff Bell. He has a close personal relationship with Woo. I have been advised that they are personal friends who socialize outside of work. It would also be politically embarrassing for the Sheriff's Office if the allegation were true. This relationship would call into question any determination that the allegations were unfounded by Bell.

22. It also creates a conflict for County Counsel to be involved in the investigation. First, there is no reason that County Counsel would be involved in conducting a criminal investigation. They simply are not experienced enough to conduct an investigations into criminal allegations. Second, they have an obligation to advocate for the county and it management staff. They have clearly showed that they

were acting on behalf of the legal interest of Bell and the Sheriff's Office in the attached letter, not as an independent fact finder.

23. In addition to the conflict of interest, I lacked any faith the investigation was credible based on the statements and omissions of Bell. For example, they would not disclose the name of the investigator, the victim, and everything that was done to determine her age. It was concerning that Woo admitted to a sexual relationship with the victim and Bell claimed to confirm she was 18 by an old document they found and not by the use of data basis available to them. There was never any verification of that age using data bases that Bell would share with me. It was also never shared when, where, or how often the sexual relations occurred. I speculated that maybe the document was dated the same day that Woo admitted to having the sexual relationship with her. If that were true it implies that the sexual relationship occurred while she was on a ride along with Woo while he was on duty. The lack of information provided to me and the refusal of Bell to give me any detail information such as the date of the sexual relationship and the date of birth of the victim seriously compromises the credibility of his "unfounded" conclusion.

24. I was told by County Counsel that if the investigation was shared with me it would breach the confidentiality of the report. I was also told it would not be released because the allegations were unfounded. If the investigation was done appropriately and correctly it would have been in their interest to show me that there was a thorough investigation that came to an unbiased conclusion supported by the evidence. They refused. That left the impression that they feared I would immediately notice that the investigation was not handled properly and their unfounded conclusion was not credible. This was the reason I had no choice ethically but to provide the information to Virgo's defense attorney.

25. It was also concerning that they labeled the investigation unfound as if it was baseless or false. It was clearly not unfounded in the sense that Woo admitted that he had a sexual relationship with the

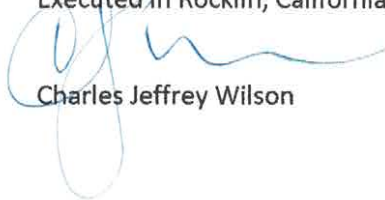
alleged victim. Calling it unfounded is an overstatement and leaves the impression that there was no merit in the allegations when in-fact there was. It also serves as a legal basis not to disclose the information to the public. Simply stated, regardless of the strength of the evidence, if Bell claims it's unfounded he never has to share it with the public.

26. When the allegations are criminal in nature, they should be investigated as a criminal case. This is typically done separately from Internal Affairs investigations. The reports from a criminal investigation cannot be deemed to be private once the investigation is closed and are subject to public review. Once the investigation is concluded, the criminal case is typically referred to the District Attorney's office for review to see if there is sufficient evidence for criminal charges. While the Sheriff's Office has done so in other case, they did not do so in this case.

27. Based on the above information, it is my opinion that the investigation of Woo was conducted in a manner that was designed to conceal information regarding the allegation and conducted in a way that is objectively inappropriate.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct to the best of my knowledge and belief.


Executed in Rocklin, California on this May 15, 2022.

A handwritten signature in blue ink, appearing to read 'C. Wilson', is written over the printed name.

Charles Jeffrey Wilson

ATTACHMENT "A"

July 20, 2018

Placer County District Attorney's Office


Dear FOIA/PIO officer:

Pursuant to my rights under the California Public Records Act (Government Code Section 6250 et seq.) and the federal Freedom of Information Act, 5 U.S.C. § 552, I request access to and copies of any/all reports in the last two years detailing investigations of illegal conduct by Placer County Undersheriff Wayne Woo.

As a representative of the news media I am only required to pay for the direct cost of duplication after the first 100 pages. Through this request, I am gathering information on allegations of illegal sexual contact with minors. This information is being sought on behalf of *KXTV-TV (ABC10)* for dissemination to the general public.

Please waive any applicable fees. Release of the information is in the public interest because it will contribute significantly to public knowledge of illegal conduct of public representatives.

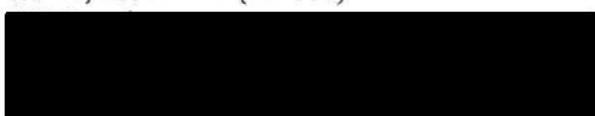
If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the act. I will also expect you to release all segregable portions of otherwise exempt material. I, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

As I am making this request as a journalist and this information is of timely value, I would appreciate your communicating with me by telephone, rather than by mail, if you have questions regarding this request.

I look forward to your reply within 20 business days, as the statute requires.

Thank you for your assistance.

Sincerely,

Jessica Pettengill
Editor, KXTV-TV (ABC10)


ATTACHMENT "B"



R. SCOTT OWENS
DISTRICT ATTORNEY

PLACER COUNTY DISTRICT ATTORNEY

www.placer.ca.gov

July 23, 2018

Jessica Pettengill
Editor, KXTV-TV (ABC10)

Dear Ms. Pettengill:

I am in receipt of your request, pursuant to the California Public Records Act (Government Code Section 6250 et seq.) and the Federal Freedom of Information Act, 5 U.S.C. § 552, to access and for copies of any/all reports in the last two years detailing investigations of illegal conduct by Placer County Undersheriff Wayne Woo regarding allegations of illegal sexual contact with minors.

Our office is not in possession of any material responsive or related to the above request. I understand that you are only requesting material regarding investigations that were alleged to have occurred within the last two years. Our office is also not in possession of any material responsive or related to your request beyond those two years.

I have forwarded your request to the Placer County Counsel's Office as the legal representative of the County and the Placer County Sheriff's Office so that they may be aware of your request and respond accordingly.

If you have any further questions please feel free to contact me at [REDACTED]

Sincerely,


Jeff Wilson
Assistant District Attorney

ATTACHMENT "C"



MEMORANDUM
R. SCOTT OWENS
DISTRICT ATTORNEY
County of Placer

To: Gerry Carden
From: Jeff Wilson
Date: 7/23/2018
Subject: PRA REQUEST

I am writing to follow up on the phone conversation regarding the California Public Records Act request submitted to our office on July 20th, 2018, requesting copies of any/all reports in the last two years detailing investigations of illegal conduct by Placer County Undersheriff Wayne Woo involving allegations of illegal sexual contact with minors. I have attach the PRA request to this memo.

I have also attached is my response to Ms. Pettengill of KXTV. While I do not have any information that is responsive to the PRA request, now that I have been advised of the accusation I would request any information that may be in your possession that I would be obligated to disclose under *Brady v. Maryland* in cases where Undersheriff Woo was a witness. My understanding from our phone conversation is that your office was recently made aware of the accusation and conducted an investigation. My further understanding was that you would provide us with the results of that investigation so that we may comply with our obligations under the law.

ATTACHMENT "D"



OFFICE OF THE
PLACER COUNTY COUNSEL

GERALD O. CARDEN, COUNTY COUNSEL

www.placer.ca.gov

July 24, 2018

Via Electronic Transmission Only - [REDACTED]

Jeffrey Wilson
Assistant District Attorney
Placer County District Attorney's Office
[REDACTED]

Re: Request for Records Confidential Personnel Records Related to Internal Affairs
Investigation

Dear Jeff:

This correspondence is in response to your request to Gerald Carden for "any information that may be in your possession that I would be obligated to disclose under *Brady v. Maryland* in cases where Undersheriff Woo was a witness."

Background: Pursuant to our agreed upon Brady Protocol, "*Brady* material in personnel files" is defined to include:

- a) Any sustained finding of misconduct that reflects upon the truthfulness, bias or moral turpitude of a witness.
- b) As to law enforcement officers any impeachment evidence contained in the DOJ criminal history database.

The Brady Protocol further provides that upon the receipt of a subpoena for an officer or employee in a case prosecuted by the District Attorney's Offices, each law enforcement agency must search the personnel records of that officer or employee for any material related to the prosecution's constitutional *Brady* obligation. If potential *Brady* materials exist, the agency representative within 7 days will contact a member of the *Brady* Committee of the District Attorney's Office and inform that member of the existence of the materials. The notification to the District Attorney will state only that there may be *Brady* material regarding the employee and the date the information was entered in the record. No actual materials from the file will be provided to the District Attorney's Office at that time.

Discussion: As you are aware, a complaint had been lodged by an employee against Undersheriff Woo. The complaint was investigated by the Sheriff's Office with oversight from

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Re: Brady Material
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this office. After a thorough investigation, which included interviews with all relevant persons, it was determined that the complaint was **unfounded**. The investigation conclusively proved that the act, or acts complained of did not occur, or the member(s) named in the complaint were not involved in the alleged misconduct. Through his attorney, the complaining employee has been informed of the result of the investigation.

The District Attorney has a constitutional duty to disclose to the defense *material* exculpatory evidence, including potential impeaching evidence, pursuant to *Brady v. Maryland* (1963) 373 U.S. 83. The duty to disclose extends to evidence known to others acting on the prosecution's behalf, including the Sheriff. For *Brady* purposes, evidence is material if it is reasonably probable its disclosure would alter the outcome of trial. [*People v. Lucas* (2014) 60 Cal.4th 153, 273-274]

A *Brady* violation occurs when: (1) the evidence at issue must be favorable to the accused, either because it is exculpatory, or because it is impeaching; (2) that evidence must have been suppressed by the State, either willfully or inadvertently; and (3) prejudice must have ensued. [*Strickler v. Greene* (1999) 527 U.S. 263, 281-282.] "Prejudice, in this context, focuses on 'the materiality of the evidence to the issue of guilt and innocence.'" [*People v. Salazar* (2005) 35 Cal.4th 1031, 1043, quoting *United States v. Agurs* (1976) 427 U.S. 97, 112, fn. 20] "Evidence would have been favorable if it would have helped the defendant or hurt the prosecution, as by impeaching one of its witnesses. Evidence would have been material only if there is a reasonable probability that, had it been disclosed to the defense, the result would have been different. The requisite reasonable probability is a probability sufficient to undermine confidence in the outcome on the part of the reviewing court. It is a probability assessed by considering the evidence in question under the totality of the relevant circumstances and not in isolation or in the abstract." [*People v. Dickey* (2005) 35 Cal.4th 884, 907-908]

In the present situation, the complaint of past criminal conduct against Undersheriff Woo has been determined to be unfounded based on the interviews of all relevant parties and the known objective evidence. If a *Pitchess* motion is to be filed, it is unlikely that a court would order the disclosure of the internal affairs investigation related to Undersheriff Woo. [See, *People v. Gutierrez* (2003) 112 C.A.4th 1463, 1473 (*Pitchess* statutory scheme for discovery of police personnel records does not unconstitutionally infringe defendant's general due process right to exculpatory evidence under *Brady*.)] The court must exclude from disclosure pursuant to *Pitchess* process all "[i]nformation consisting of complaints concerning conduct occurring more than five years before the event or transaction that is the subject of the litigation in aid of which discovery or disclosure is sought." [Evid. Code § 1045(b)(1)] For *Brady* purposes the five year limitation does not provide a complete bar to disclosure of complaints that are determined by the trial court after an in chambers review to be "exculpatory". [*Los Angeles v. Superior Court (Brandon)* (2002) 29 Cal.4th 1, 15] However, under the above factors, it is unlikely that a court would order a disclosure.

Conclusion: The Sheriff investigated the employee complaint against Undersheriff Woo and determined it to be unfounded. Based on the advice of County Counsel, the Sheriff will not

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Re: Brady Material
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produce the confidential investigation to the District Attorney or any other person unless ordered by the court pursuant to a *Pitchess* motion. [*People v. Superior Court (Johnson)* (2015) 61 Cal.4th 696, 712; Evid. Code §§ 1043 and 1045].

Very truly yours,

OFFICE OF THE PLACER COUNTY COUNSEL

By: 
Brett D. Holt
Supervising Deputy County Counsel

BDH / bhs

Cc: Gerald O. Carden, County Counsel
Devon Bell, Placer County Sheriff

ATTACHMENT "E"



Jered T. Ede, Chief Legal Officer
[REDACTED]

May 13, 2022

VIA E-MAIL

Charles "Jeff" Wilson
[REDACTED]

Re: Demand for Documents under California Public Records Request Act

Dear Charles "Jeff" Wilson:

It has come to my attention that you may hold in your possession certain records which qualify as public records under the California Public Records Act (see Cal. Gov't Code §6252 *et seq.*) responsive to Public Records Act Requests made by Ms. Lynette Dubey on or around March 9, 2022 and March 16, 2022 (the "Requests"). I am writing today to demand those responsive documents be produced.

Ms. Dubey made her Requests seeking records relating to an investigation of "allegations of inappropriate sexual conduct regarding Placer County Under-Sheriff Wayne Woo." Her Requests were submitted to and received by the Placer County Clerk of the Board, Sheriff's Office, the District Attorney's Office, and the Office of County Counsel for Placer County. On March 15 and 28, 2022, the Placer County Counsel responded to the Requests by claiming, among other things, that "the County has no public records responsive to your requests." The County also argued that the records sought by Ms. Dubey consisted of unsubstantiated political allegations against a candidate for public office such that the public might be "confused" should such records be released. The County further claimed such records are exempt from disclosure under Cal. Gov't Code §6254(c) [personnel records] and (f) [investigatory files].

These denials are specious and unmeritorious.

First, the County's claim that such records do not exist is belied by the County's other claims that such records are protected from disclosure, and, more importantly, from the discovery that not only do such records exist, but you have a copy of such records in your possession. This alone justifies a writ of mandamus under Cal. Gov't Code §6259.

[REDACTED]
[REDACTED]
[REDACTED]



May 13, 2022

Charles "Jeff" Wilson

Re: Demand for Documents under California Public Records Request Act

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Second, the County's claim that the records are personnel records or investigative records is self contradictory and demonstrates a violation of the California Public Records Act itself. Under Cal. Gov't Code §6254(f), even when documents may properly be excluded from production as investigative files, the law requires the public agency disclose a host of other information or alternatively at least attempt to show some statutory reason why such additional information should not be disclosed. In this case, the County did neither, and this too justifies a Writ of Mandamus under Cal. Gov't Code §6259.

Third, the County's withholding of the documents under the claim that they constitute unsubstantiated political accusations against a candidate for public office is not a valid reason for exclusion and certainly not encompassed within the statutory exclusions enumerated under Cal. Gov't Code §6254.

The records in your possession are directly relevant to the merits of the Writ of Mandamus that clearly is justified by the County's violations of the California Public Records Act detailed above. The records I understand you have would tend to show that the allegations are not in fact unsubstantiated political allegations (even if one were to assume California law included that as a valid reason to not disclose documents), would reveal the information required by §6254(f) to be disclosed even where records themselves cannot be disclosed, and would directly disprove the County's position that the records themselves either do not exist and/or are not in fact "public records." At a minimum, your records would satisfy the liberal discovery standard of relevancy under California law such that your records would either tend to prove or disprove a claim or lead to the discovery of such records. It is clear that if we determine to file a Petition for Writ of Mandamus, we would be entitled to subpoena the records from you.

Accordingly, we are asking instead that you turn such records over now to allow for a more fulsome discussion of the merits of a Writ of Mandamus with the County Counsel in the hopes of avoiding the need to file such a petition, and more importantly to avoid the legal expense and hassle of issuing and serving a subpoena for records.

Of course, you should feel free to contact me if you have any questions or concerns, or wish to discuss how to produce the documents. We are happy to work with you to make the production as convenient as possible for you, and to address any

[REDACTED]



May 13, 2022

Charles "Jeff" Wilson

Re: Demand for Documents under California Public Records Request Act

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concerns you may have regarding such production. I extend my gratitude to you for your anticipated cooperation with this demand.

Best Regards,

A handwritten signature in black ink, appearing to read "J. Ede", written over the typed name.

Jerred T. Ede, Esq.
Chief Legal Officer
Project Veritas

